



December 20, 2013

SUBJECT: Job Approval Authority and Certified Conservation Planners

TO: All NRCS Employees

File Code: 210

This month, we as the conservation partnership community celebrate the edge-of-field milestones published by Chesapeake Bay Cropland Conservation Effects Assessment Project (CEAP).

- Sediment decreased by 60 percent,
- Nitrogen decreased by 26 percent, and
- Phosphorus by 46 percent.

The report shows that voluntary conservation works. Agricultural producers, forest landowners, and the conservation community have made great strides to achieve solid conservation results in the Chesapeake Bay Watershed.

Throughout the Watershed, there is an ongoing desire and need to document all of the voluntary conservation that is occurring on the landscape. For Natural Resources Conservation Service (NRCS) employees, the policy is clear. Conservation practices planned on the landscape and entered into our reporting system must meet standards and specifications outlined in Section IV of the Field Office Technical Guide (FOTG). The same applies to partners whose employees serve under an NRCS Cooperative agreement, i.e. Strategic Watershed Action Teams (SWAT), Pheasants Forever, and Resource Conservation & Development Councils.

Many conservation districts are identifying and documenting already-existing conservation practices that have not been recorded in previous accounting systems. Some of these practices may not meet FOTG standards and specifications. It is important to note that for those individuals employed by NRCS, under agreement by NRCS, or granted NRCS's job approval, specific performance expectations remain in effect. Individuals who advocate, plan, and install new engineered conservation practices must do so in accordance with the National Planning Procedures Handbook (NPPH), National Conservation Planning Policy, and the FOTG or risk losing their engineering job approval authority or conservation planning certification.

National Engineering Manual, (210, Part 501)

Engineering job approval authority is the quality assurance process that ensures adequate consideration by competent NRCS employees in the planning, design, and installation of conservation engineering practices that, with proper operation and maintenance, will perform the intended functions for the planned practice service life. Engineering job approval authority additionally serves to maintain the credibility and trust of NRCS engineering with State engineering boards of licensure and with the public. All conservation engineering practice designs must be approved by a qualified person who has appropriate engineering job approval authority. . . . Engineering technical assistance for the planning, design, and installation of conservation practices must . . . (6) Comply with NRCS and industry-established practice standards, technical criteria, and policies.

For NRCS, the practice standards are those that meet Section IV of the FOTG. Like engineering, the same concept applies to conservation planning.

General Manual, National Conservation Planning Policy (180, Part 409)

Certified planners must ensure the conservation plan meets the needs of the client; NRCS conservation planning policy, procedures, and standards; and any applicable program or provision requirements. For NRCS and its certified partners, all conservation planning activity must follow the standards and references utilized in the National Planning Procedures Handbook and acknowledge its relationships to Sections I-IV of the Field Office Technical Guide.

Individuals who are not certified conservation planners and do not have adequate engineering job approval authority do not have the ability to make these technical determinations that a practice meets FOTG standards or National Planning Procedures Handbook (NPPH) criteria. For those documenting conservation practices into a database for the purpose of documenting some nutrient or sediment reductions, who also have our Job Approval Authority (JAA) and cannot verify a practice meets FOTG standards, NRCS asks that you provide the following written disclaimer to the landowner or agricultural producer in correspondence or face-to-face discussions with the producer:

"The following practice does not meet or cannot be adequately determined to meet the NRCS Field Office Technical Guide standards. Practices that meet Field Office Technical Guide standards are designed to function under normal conditions and comprehensively address the natural resource concerns identified."

We are at a crossroads in the Chesapeake Bay Watershed community and one where we must find a balance. Partners have a need to document practices to show overall phosphorus, nitrogen, and sediment reductions, and NRCS has a need to provide technically sound practices that are uniform in function and design to maintain program integrity. For those of us within NRCS, Field Office Technical Guides (FOTGs) are the foundation to managing local resources at the sustainable level. These technical guides are the primary scientific references for NRCS to inventory resources, develop alternatives, install and implement systems of practices, and evaluate their effectiveness. Their development is not taken lightly and takes into account the latest proven science, technology and research needed to adequately sustain our natural resources from across the nation.

NRCS hopes that this disclaimer provides a balance to our partners who must document voluntary, non-cost-shared practices that may not meet our standards, and those of NRCS and its partners who are certified planners and have engineering job approval authority.

Sincerely,



DENISE COLEMAN
State Conservationist

cc: Rich Sims, Regional Conservationist, NRCS
Karl Brown, State Conservation Commission, Harrisburg, PA
Glenn Rider, Department of Environmental Protection, Harrisburg, PA
Steve Taglang, Department of Environmental Protection, Harrisburg, PA
Rachel Reyna, Department of Conservation and Natural Resources Protection, Harrisburg, PA
Matt Royer, Penn State University, State College, PA
Robert Maiden, Pennsylvania Association of Conservation Districts, Harrisburg, PA